



MONTANA  
TELECOMMUNICATIONS  
ASSOCIATION

October 13, 2015

Ex Parte

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, D.C. 20554

*In the Matter of*

Connect America Fund: WC Docket No. 10-90; and  
Mobility Fund: WT Docket No. 10-208.

Dear Ms. Dortch,

Representatives of Montana's rural telecommunications industry, U.S. Senator Jon Tester and members of his staff, and the undersigned met today in Great Falls, Montana, with Chairman Tom Wheeler and Mike Dabbs of the Commission's Office of Legislative Affairs.

The telecom industry representatives discussed the need for predictability and stability in any High Cost universal service (Connect America) fund reforms that the Commission adopts. They mentioned the challenges of building out broadband infrastructure in a state like Montana with vast distances between very few customers spread over rugged terrain. They stressed how important it is to identify both predictable broadband objectives and predictable support, without which it is difficult to obtain financing necessary to fund broadband deployment. They pointed out that it currently is impossible to determine what level of support carriers may receive under either a model-based or rate-of-return-based support mechanism, given the current budget-driven process and its unpredictable effect on final support levels.

Nemont mentioned the company has not received its final Mobility Fund support payment, despite having complied with all relevant rules. The company further indicated that despite the Commission's effort to create partial economic areas (PEAs) for the purpose of attracting smaller designated entities to participate in the upcoming spectrum auction, the PEA in Montana for which Nemont would be interested in bidding is still far too large for the company to afford. Finally, the company urged the Chairman to proceed with a second

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Mobility Fund proceeding to continue to support wireless service deployment to unserved areas.

Respectfully submitted,

/s/

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cc. Mike Dabbs

List of Companies and their representatives attending today's meeting:

3 Rivers Communications  
Dave Gibson, CEO; Phil Maxwell, Regulatory Affairs Specialist  
Blackfoot Communications  
Bill Squires, CEO; Jason Williams, Sr. Vice President & General Counsel  
InerBel Telephone Cooperative  
Rob Little, Plant Supervisor  
Lincoln Telephone Company  
Ken Lumpkin, General Manager  
Mid-Rivers Telephone Cooperative  
Michael Candelaria, General Manager; Erin Lutts, External Relations Mgr.  
Nemont Telephone Cooperative  
Mike Kilgore, General Manager; Remi Sun, Chief Financial Officer  
Northern Telephone Cooperative  
Mike Sheard, General Manager; Kirby Lohr, Director  
Range Telephone Cooperative  
Rob Johnstone, Corporate Marketing Director  
Ronan Telephone Company  
Jay Preston, CEO; Cynthie Preston, Director  
Triangle Communications  
Rick Stevens, General Manager; Gail Rainey, Assistant Manager  
Vision Net  
Rob Ferris, CEO